



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Patricia Blevins, Treasurer
Democratic State Committee Delaware
P.O. Box 2065
Wilmington, DE 19899

MAY 22 2002

Identification Number: C00211763

Reference: Amended Mid-Year Report (1/1/01-6/30/01), dated 1/30/02

Dear Ms. Blevins:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule A supporting Line 15 of your report discloses a payment(s) from a federal candidate committee(s) for goods and/or services provided by your committee. 11 CFR §100.7(a)(1)(iii)(A) states that "...the provision of any goods or services without charge or at a charge which is less than the usual and normal charge for such goods or services is a contribution." Examples of goods and services include equipment, supplies, personnel, membership lists and mailing lists. The term "usual and normal charge" for goods is defined as "...the price of those goods in the market from which they ordinarily would have been purchased at the time of the contribution". The usual and normal charge for services is defined as "...the hourly or piecework charge for the services at a commercially reasonable rate prevailing at the time the services were rendered." 11 CFR §100.7(a)(1)(iii)(B)

Please clarify whether your committee assessed the usual and normal charge for the goods and/or services you provided to the federal candidate committee(s) and explain the steps your committee took in determining the amount(s) charged. If your committee provided the goods and/or services at less than the usual and normal charge, the difference between the two is considered to be an in-kind contribution by your committee to the federal candidate committee(s) and is subject to the limits set forth at 2 U.S.C. §441a. (11 CFR §100.7(a)(1)(iii)(A))

-Schedule A of your report (pertinent portion attached) discloses a receipt of \$3,200 in *Misdeposited contributions*. Please clarify whether this transfer(s) is from an account maintained by your committee for non-federal activity. If so, be advised that such a transfer is prohibited by 11 CFR §102.5(a)(1)(i) and the full amount of the transfer(s) should be returned to the non-federal account. Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for the transfer-out. In addition, the transfer-out should be disclosed on Schedule B supporting Line 22 of your next report.

If this transaction represents an "internal transfer" of funds from one federal account to another, and the source(s) of such funds has been identified in previous reports of receipts and disbursements, please note that such transfers should not be itemized as doing so inflates total receipts and cash on hand. If this is the case, please amend your report accordingly.

Although the Commission may take further legal action regarding the acceptance of funds from a non-federal account, your prompt transfer-out of the impermissible funds or clarification of the transaction, will be taken into consideration.

-Itemized disbursements must include a brief statement or description of why the disbursements were made. Please amend Schedule(s) H4 of your report to clarify the following description(s): "reimbursement". For further guidance regarding acceptable purposes of disbursements, please refer to 11 CFR §104.3(b)(3).

-Please clarify all expenditures for "voter registration" and/or "GOTV". If any of these activities referenced House or Senate candidates, they should be allocated accordingly, unless merely incidental to the overall activity. If a portion or all of these expenditures were made on behalf of federal candidates, they should be reported on Schedules B, E, or F for Lines 23, 24, or 25 of the Detailed Summary Page, as appropriate.

-Your report does not include a Schedule H1 to disclose the ratio for the allocation of administrative and generic voter drive costs. Schedule H1 must be filed with the first report each year for National, State and Local party committees, and with the first report filed in the two-year election cycle for Separate Segregated Funds and Non-connected committees. All shared administrative and generic voter drive costs incurred during the

two-year cycle must be allocated according to this ratio, unless the federal account elects to pay a higher percentage of its cost. 11 CFR §106.5(b)(2), (d)(1), (d)(2) and 11 CFR §§104.10(b)(1)(ii)(B) and 106.6(c)

-Schedule H3 of your report (pertinent portion(s) attached) discloses a transfer(s)-in from "Victory 2000 Nonfed - Media". Please note that 11 CFR §106.5 (g)(1)(i) permits a committee to "pay the entire amount of an allocable expense from its federal account and shall transfer from its non-federal account to its federal account solely to cover the non-federal share of that allocable expense" (emphasis added). If "Victory 2000 Nonfed - Media" is not a non-federal account of your committee, such a transfer(s) is prohibited.

If the transfer(s) in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. If you have received a prohibited transfer(s), you must transfer-out the impermissible funds to an account not used to influence federal elections or refund the full amount to the donor.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for the transfer-out or refund. In addition, any transfers-out or refunds should be disclosed on Schedule B supporting Line 22 or 28 of the report covering the period during which the transaction was made.

Although the Commission may take further legal action concerning the acceptance of prohibited transfers, prompt action by your committee to transfer-out or refund the amount will be taken into consideration.

-Schedule H3 of your report discloses transfers received from your non-federal account for the "Issue Ads" event(s) which occur outside the permissible transfer period. Please be advised that transfers for shared activity must be made within a 70-day time period: no more than 10 days before or 60 days after the payment to the vendor. 11 CFR §§106.5(g)(2) and 106.6(e)(2) Please clarify the nature of these transfers-in from the non-federal account.

The Commission recommends that you immediately transfer the total excessive amount received by your federal account outside the 70-day time period back to your non-federal account. Although the Commission may take further legal action concerning this prohibited activity, your prompt action will be taken into consideration.

-Schedule H3 of your report discloses a transfer(s)-in from a non-federal account(s) for April 2001 Reception which appears to exceed the permissible amount(s) indicated by your allocation ratio for this event. Please be advised that transfers for shared activity must not exceed the non-federal share of the joint disbursements and that these transfers must be made within a 70-day time period: no more than 10 days before or 60 days after payment to the vendor. 11 CFR §§106.5(g)(2) and 106.6(e)(2) Please clarify the nature of this transfer(s)-in from the non-federal account.

The Commission recommends that you immediately transfer the total excessive amount received by your federal account back to your non-federal account. Although the Commission may take further legal action concerning this prohibited activity, your prompt action will be taken into consideration.

-Schedule A supporting Line 15 of the Detailed Summary Page discloses a refund(s) or rebate(s) of what appears to be a previously disclosed allocable expense(s) from several vendors. Please be advised that when a committee receives a refund or rebate of an allocable expense, it must be allocated between the federal and non-federal accounts according to the same allocation ratio used to allocate the original disbursement. Furthermore, the federal account must transfer the non-federal portion to the non-federal account and disclose this transfer-out on Schedule H4. Your report does not appear to disclose a transfer-out of the non-federal portion of this refund(s) or rebate(s). Please provide clarification regarding this apparent omission.

-Schedule D supporting Line 10 of the Summary Page discloses debts owed to your non-federal account totaling \$3,200. 11 CFR §§106.5 and 106.6 requires that all shared expenses be paid from the federal account and allows the non-federal account to transfer-in its share of the expense no more than 10 days before or 60 days after payment by the federal account.

The outstanding debt owed to your non-federal account must be paid immediately, as it represents a subsidization of federal activity by your non-federal account. Such activity is a violation of 11 CFR §102.5.

Although the Commission may take further legal steps concerning this prohibited activity, your prompt payment of the debt will be taken into consideration.

DEMOCRATIC STATE COMMITTEE DELAWARE
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-On Schedule D of your previous report, you disclosed a debt(s) owed to AMS Communications, Inc. and Non-federal Account. This obligation(s), however, has been omitted from this report. Please amend your report to include this debt(s) on Schedule D and Line 10 of the Summary Page. All debts and obligations must be disclosed until extinguished. 11 CFR §104.11

-Your report discloses an outstanding balance(s) beginning this period for a debt(s) owed to *Ambrosino, Muir & Hansen* and *Non Federal Account - 2*. However, an outstanding balance(s) at the close of the period was not disclosed on your Year End Report. Please amend your report(s) to clarify this discrepancy.

-The beginning cash balance of this report should equal the ending balance of your 2000 Year End Report. Please clarify this discrepancy and amend any subsequent report(s) that may be affected by this correction.

A response or amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,



Julie Perry
Reports Analyst
Reports Analysis Division

SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS

Use separate schedule(s)
or each category of the
Detailed Summary Page

FOR LINE NUMBER:
(check only one)

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☐ 11a ☐ 11b ☐ 11c ☐ 12
☐ 13 ☐ 14 ☐ 15 ☐ 16 ☒ 17

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)

Democratic State Committee (Delaware)

Full Name (Last, First, Middle Initial)

A. Sun National

Mailing Address

4th & Lincoln

City

Wilmington

State

DE

Zip Code

19804

FEC ID number of contributing
federal political committee.

Name of Employer

Occupation

Receipt For:

☐ Primary ☐ General

☐ Other (specify) ▼

Aggregate Year-to-Date ▼

2.84

Date of Receipt

01 / 30 / 2001

Amount of Each Receipt this Period

2.84

Interest

Transaction ID: A17-15-00001-00001

Full Name (Last, First, Middle Initial)

B. Mideposited contributions

Mailing Address

PO Box 2058

City

Wilmington

State

DE

Zip Code

19899

FEC ID number of contributing
federal political committee.

Name of Employer

Occupation

Receipt For:

☐ Primary ☐ General

☐ Other (specify) ▼

Aggregate Year-to-Date ▼

3200.00

Date of Receipt

04 / 16 / 2001

Amount of Each Receipt this Period

3200.00

mideposited funds

Transaction ID: A17-15-01166-01423

C.

SUBTOTAL of Receipts This Page (optional)

3202.84

TOTAL This Period (last page this line number only)

3202.84

SCHEDULE H3 (FEC Form 3X)
TRANSFERS FROM NON-FEDERAL ACCOUNTS

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 FOR LINE 18 OF FORM 3X

NAME OF COMMITTEE (In Full)
 Democratic State Committee (Delaware)

NAME OF ACCOUNT
 Victory 2000 NonFed-Media

DATE OF RECEIPT
 01 08 2001

TOTAL AMOUNT TRANSFERRED
 1881.10

BREAKDOWN OF TRANSFER RECEIVED

ADMINISTRATIVE/VOTER DRIVE AMOUNT

Transaction ID:

H318-13-00788

i) Total Administrative/Voter Drive

1881.10

ii) Direct Fundraising
 (List Events-Amount For Each)

DIRECT FUNDRAISING AMOUNT

a) _____

b) _____

c) _____

d) _____

e) Total Amount Transferred For Direct Fundraising

0.00

iii) Exempt Activity/Direct Candidate Support
 (List Events-Amount For Each)

**EXEMPT ACTIVITY/
 DIRECT CANDIDATE SUPPORT**

a) _____

b) _____

c) _____

d) _____

e) Total Amount Transferred For
 Exempt Activity/Direct Candidate Support

0.00

TOTALS FOR BREAKDOWN OF TRANSFER RECEIVED

TOTAL This Period
 (Administrative/Voter Drive Amount)

TOTAL This Period (Direct Fundraising Amount)

TOTAL This Period (Exempt Activity/Direct Candidate Support)

TOTAL This Period (Total Amount Transferred)

SCHEDULE H3 (FEC Form 3X)
TRANSFERS FROM NON-FEDERAL ACCOUNTS

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 FOR LINE 18 OF FORM 3X

NAME OF COMMITTEE (in Full)
 Democratic State Committee (Delaware)

NAME OF ACCOUNT
 Victory 2000 NonFed-Media

DATE OF RECEIPT

01 09 2001

TOTAL AMOUNT TRANSFERRED

731.71

BREAKDOWN OF TRANSFER RECEIVED

ADMINISTRATIVE/VOTER DRIVE AMOUNT

Transaction ID:

H318-13-00769

i) Total Administrative/Voter Drive

731.71

ii) Direct Fundraising
 (List Events-Amount For Each)

DIRECT FUNDRAISING AMOUNT

a) _____

b) _____

c) _____

d) _____

e) Total Amount Transferred For Direct Fundraising

0.00

iii) Exempt Activity/Direct Candidate Support
 (List Events-Amount For Each)

**EXEMPT ACTIVITY/
 DIRECT CANDIDATE SUPPORT**

a) _____

b) _____

c) _____

d) _____

e) Total Amount Transferred For

Exempt Activity/Direct Candidate Support

0.00

TOTALS FOR BREAKDOWN OF TRANSFER RECEIVED

TOTAL This Period
 (Administrative/Voter Drive Amount)

TOTAL This Period (Direct Fundraising Amount)

TOTAL This Period (Exempt Activity/Direct Candidate Support)

TOTAL This Period (Total Amount Transferred)

SCHEDULE H3 (FEC Form 3X)
TRANSFERS FROM NON-FEDERAL ACCOUNTS

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 FOR LINE 18 OF FORM 3X

NAME OF COMMITTEE (In Full)
 Democratic State Committee (Delaware)

NAME OF ACCOUNT	DATE OF RECEIPT	TOTAL AMOUNT TRANSFERRED
Victory 2000 NonFed-Media	01 17 2001	3000.00

BREAKDOWN OF TRANSFER RECEIVED

ADMINISTRATIVE/VOTER DRIVE AMOUNT

Transaction ID:

H318-13-00772

i) Total Administrative/Voter Drive

3000.00

ii) Direct Fundraising

(List Events-Amount For Each)

DIRECT FUNDRAISING AMOUNT

a)

b)

c)

d)

e) Total Amount Transferred For Direct Fundraising ..

0.00

iii) Exempt Activity/Direct Candidate Support
 (List Events-Amount For Each)

**EXEMPT ACTIVITY/
 DIRECT CANDIDATE SUPPORT**

a)

b)

c)

d)

e) Total Amount Transferred For

Exempt Activity/Direct Candidate Support

0.00

TOTALS FOR BREAKDOWN OF TRANSFER RECEIVED

TOTAL This Period

(Administrative/Voter Drive Amount)

TOTAL This Period (Direct Fundraising Amount)

TOTAL This Period (Exempt Activity/Direct Candidate Support)

TOTAL This Period (Total Amount Transferred)

SCHEDULE H3 (FEC Form 3X)
TRANSFERS FROM NON-FEDERAL ACCOUNTS

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 FOR LINE 18 OF FORM 3X

NAME OF COMMITTEE (In Full)
 Democratic State Committee (Delaware)

NAME OF ACCOUNT	DATE OF RECEIPT	TOTAL AMOUNT TRANSFERRED
Victory 2000 NonFed-Media	08 13 2001	6886.44

BREAKDOWN OF TRANSFER RECEIVED

ADMINISTRATIVE/VOTER DRIVE AMOUNT

Transaction ID:

i) Total Administrative/Voter Drive

5886.44

H318-13-00861

ii) Direct Fundraising

(List Events-Amount For Each)

DIRECT FUNDRAISING AMOUNT

a) _____

b) _____

c) _____

d) _____

e) Total Amount Transferred For Direct Fundraising

0.00

iii) Exempt Activity/Direct Candidate Support

(List Events-Amount For Each)

**EXEMPT ACTIVITY/
 DIRECT CANDIDATE SUPPORT**

a) _____

b) _____

c) _____

d) _____

e) Total Amount Transferred For

Exempt Activity/Direct Candidate Support

0.00

TOTALS FOR BREAKDOWN OF TRANSFER RECEIVED

TOTAL This Period

(Administrative/Voter Drive Amount)

TOTAL This Period (Direct Fundraising Amount)

TOTAL This Period (Exempt Activity/Direct Candidate Support)

TOTAL This Period (Total Amount Transferred)

SCHEDULE H3 (FEC Form 3X)

TRANSFERS FROM NON-FEDERAL ACCOUNTS

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FOR LINE 18 OF FORM 3X

NAME OF COMMITTEE (In Full)

Democratic State Committee (Delaware)

NAME OF ACCOUNT

Victory 2000 NonFed-Media

DATE OF RECEIPT

08 22 2001

TOTAL AMOUNT TRANSFERRED

3683.48

BREAKDOWN OF TRANSFER RECEIVED

ADMINISTRATIVE/VOTER DRIVE AMOUNT

Transaction ID:

3683.48

H31B-13-00966

i) Total Administrative/Voter Drive

ii) Direct Fundraising

(List Events Amount For Each)

DIRECT FUNDRAISING AMOUNT

a) _____

b) _____

c) _____

d) _____

e) Total Amount Transferred For Direct Fundraising

0.00

iii) Exempt Activity/Direct Candidate Support

(List Events Amount For Each)

EXEMPT ACTIVITY/ DIRECT CANDIDATE SUPPORT

a) _____

b) _____

c) _____

d) _____

e) Total Amount Transferred For

Exempt Activity/Direct Candidate Support

0.00

TOTALS FOR BREAKDOWN OF TRANSFER RECEIVED

TOTAL This Period

(Administrative/Voter Drive Amount)

88438.72

TOTAL This Period (Direct Fundraising Amount)

9647.10

TOTAL This Period (Exempt Activity/Direct Candidate Support)

5713.33

TOTAL This Period (Total Amount Transferred)

81799.15

The first part of the paper discusses the importance of understanding the cultural context of the research. It highlights the need for researchers to be sensitive to the values and beliefs of the communities they are studying. This is particularly important in the field of education, where cultural differences can significantly impact learning outcomes. The paper then moves on to discuss the challenges of conducting research in culturally diverse settings. It notes that researchers often face difficulties in establishing rapport with participants and in interpreting their responses. To address these challenges, the paper suggests several strategies, including the use of local researchers and the development of culturally appropriate research instruments. The final part of the paper discusses the importance of sharing research findings with the community. It argues that research should not only be conducted for the benefit of the community but also for the benefit of the community itself. This means that researchers should work closely with community members to ensure that their research is relevant and useful to them.

In conclusion, the paper emphasizes the need for a culturally sensitive approach to research. It argues that researchers must be aware of the cultural context of their research and must take steps to ensure that their research is relevant and useful to the community. This requires a commitment to understanding the values and beliefs of the community and a willingness to adapt research methods to suit the needs of the community. The paper also highlights the importance of sharing research findings with the community and of working closely with community members to ensure that the research is relevant and useful to them. By following these principles, researchers can ensure that their research is both culturally sensitive and socially responsible.